

**OPEN MEETING AGENDA ITEM**

Chairwoman Lea Márquez-Peterson and Commissioners  
Docket Control  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

**RE: Docket No. E-01345A-19-0236: Comments by The Western Way in Opposition to the Continuation of Arizona Public Service's Grid Access Charge**

Chairwoman Márquez-Peterson and Commissioners:

On behalf of The Western Way, we submit this comment regarding the potential continuation of the APS Grid Access Charge. While there may be costs associated with distributed generation, a review of the record in the APS rate case lacks specific evidence to support the charge to rooftop solar customers that APS is seeking. The Commission owes it to Arizonans to ensure that customers only pay necessary fees and charges that are supported by the evidence.

The very nature of a ratemaking case gives a utility a process and opportunity to introduce evidence in support of the charges that it seeks. In this case, APS had the time and opportunity to introduce evidence into the record in support of a charge to rooftop solar customers—a charge that it has long suggested is justified.

The Western Way acknowledges that there may be an increased cost to serve solar customers. However, APS did not introduce any evidence indicating what the cost is. As such, the Commission has no way to determine the basis for the charge for which APS is seeking approval or whether such a charge is an accurate reflection of the costs of distribution generation; indeed, the Commission does not actually have any way to determine whether there is a cost to APS associated with distributed generation at all.

The Recommended Opinion and Order is clear that the Commission does not have sufficient information in the record to reach a conclusion about the costs that rooftop solar customers cause to the grid.<sup>1</sup> In the absence of actual evidence of costs necessary to justify the charge, it is inappropriate for the Commission to require Arizonans with rooftop solar to continue to pay the Grid Access Charge every month.

Thank you for your consideration of this comment and attention to this issue.

Sincerely,

Doran Arik Miller  
Arizona Director, The Western Way

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<sup>1</sup> ROO at 254: 11-12, 356:21-22.